

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States Courts
Southern District of Texas
FILED

October 13, 2022

Nathan Ochsner, Clerk of Court

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

United States Postal Service Priority Mail Express Parcel
9570 1104 7127 2285 1284 73

Case No. **4:22-mj-2415**

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

United States Postal Service Priority Mail Express Parcel 9570 1104 7127 2285 1284 73, currently located at 4600 Aldine Bender Rd., Houston, TX 77315

located in the Southern District of Texas, there is now concealed (identify the person or describe the property to be seized):

Controlled Substances and/or Proceeds

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 USC 841(a)(1)	Distribution of a Controlled Substance
21 USC 846	Conspiracy

The application is based on these facts:
(See Attached Affidavit)

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

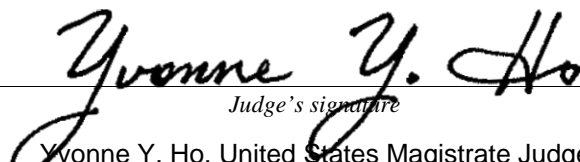

Applicant's signature

Christopher J. Farmer, U.S. Postal Inspector
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
Telephone _____ (specify reliable electronic means).

Date: October 13, 2022

City and state: Houston, TX


Judge's signature
Yvonne Y. Ho, United States Magistrate Judge
Printed name and title

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In the Matter of the Search of:	§	Magistrate No. 4:22-mj-2415
	§	
United States Postal Service Priority Mail	§	
Express Parcel 9570 1104 7127 2285 1284	§	
73	§	

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, Christopher J. Farmer, being duly sworn, state the following:

1. I am a Postal Inspector with the United States Postal Inspection Service (“USPIS”). I have been employed by the USPIS for approximately nine (9) years and am currently assigned to the USPIS Houston Division Contraband Interdiction & Investigations Team. I have received advanced training by the USPIS in the investigation of controlled substances and proceeds/payments being transported through the United States Mail.

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

3. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that the U.S. Postal Service (“USPS”) Priority Mail Express and Priority Mail are frequently utilized by drug traffickers for shipping controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances. Use of Priority Mail Express and Priority Mail are favored because of the

speed (Priority Mail Express - overnight; Priority Mail - two day delivery), reliability, free telephone and internet package tracking services, as well as the perceived minimal chance of detection. Priority Mail Express was originally intended for urgent, business-to-business, correspondence. Intelligence from prior packages, which were found to contain controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, has indicated that these parcels are usually addressed from an individual to an individual. Priority Mail Express is seldom used for individual-to-individual correspondence.

4. In an effort to combat the flow of controlled substances through the overnight delivery services, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known “sources” of controlled substances. The USPIS conducts an ongoing analysis of prior packages mailed through overnight delivery services, which were found to contain controlled substances or proceeds/payments of controlled substance sales. The analysis of prior packages, which were found to contain controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, indicated that these parcels are usually sent from an individual to an individual. In the few cases when overnight delivery packages containing controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, have displayed a business or company name, it has usually proven to be fictitious or used without the owner’s knowledge and consent. Additionally, this analysis has established a series of characteristics which, when found in combination of two (2) or more, have shown a high probability that the package will contain a controlled substance or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to include USPS Priority Mail Express and Priority Mail, Federal Express, and United Parcel Service.

This profile includes, but is not limited to, the following characteristics: package mailed from or addressed to a narcotic source city; package has a fictitious return address; package addressee name is unknown at the destination address; package sender name is unknown at the return address; package has address information which is handwritten; package is mailed to or from a Commercial Mail Receiving Agency (CMRA); package is addressed from an individual to an individual; phone numbers listed on the package are not related to the listed parties or are not in service; packages are wrapped and/or heavily taped; frequency of the mailings is inconsistent with normal use absent a business relationship; and the ZIP Code from where the package is mailed is different than the ZIP Code used in the return address.

5. The USPS analysis of prior narcotics packages mailed through overnight delivery services has consistently shown that the identification of source cities has proven to be one of several reliable characteristics used in identifying suspect parcels. This analysis has also demonstrated that narcotics parcels originating from states other than source locations have been consistently found to contain designer drugs, such as Ecstasy, GBL, GHB, Anabolic Steroids, and other similar controlled substances. Generally such designer drugs are not organic and are the product of a laboratory process.

6. This affidavit is made in support of an application for a federal search warrant to search USPS Priority Mail Express Parcel 9570 1104 7127 2285 1284 73 (“the Subject Parcel”). The Subject Parcel is described more particularly as follows:

Subject Parcel:	Priority Mail Express Parcel 9570 1104 7127 2285 1284 73
Sender:	Allison Trejo 1607 Anvil Dr. Houston, TX. 77090 (346) 975-0755
Other Sender Listed:	Allison Trejo 1602 Anvil Dr. Houston, TX 77090

Addressee:	Cliff Gifford 1807 Wyndhurst Rd Toledo, OH 43607
Size/Dimensions:	White Tyvek Mailing Envelope Approximately 12.5" x 10" x 3"
Postmarked:	October 12, 2022
Postmark Origin:	Houston, TX 77077
Postage Amount:	\$44.05
Weight:	0 lbs., 14 oz.

7. On or about October 12, 2022, your Affiant was contacted by Texas Department of Public Safety ("Texas DPS") Special Agent E. Rohlack. Special Agent Rohlack advised Texas DPS was conducting physical surveillance on two known drug suspects – a female and a male. Special Agent Rohlack advised Texas DPS had observed the male and female enter the 77077 post office carrying an object, which Affiant later identified as the Subject Parcel. Your Affiant immediately traveled to the 77077 post office and retrieved the Subject Parcel and noted it bore several characteristics indicative of a narcotics/narcotics proceeds-related parcel. The Subject Parcel was mailed out via USPS Priority Mail Express from a known narcotics source area to a known destination area, was mailed person-to-person, and sender/addressee information was handwritten.

8. On or about October 12, 2022, your Affiant conducted an open records query of the sender information listed on the Subject Parcel which revealed "1607 Anvil Dr., Houston, TX 77090" to not be a valid address. Affiant knows based upon his training and experience that narcotics traffickers often use fictitious names and addresses, or incomplete sender information, in order to conceal their true identities from law enforcement.

9. On or about October 12, 2022, your Affiant conducted an open records query of the other sender information listed on the Subject Parcel which revealed "1602 Anvil Dr., Houston,

TX 77090” to be a valid address; however, Affiant was unable to associate the name “Allison Trejo” with the sender address. Affiant knows based upon his training and experience that narcotics traffickers often use fictitious names and addresses, or incomplete sender information, in order to conceal their true identities from law enforcement .

10. On or about October 12, 2022, your Affiant conducted an open records query of the recipient information listed on the Subject Parcel which revealed “1807 Wyndhurst Rd, Toledo, OH 43607” is a valid delivery address; however, Affiant was unable to associate the name “Cliff Gifford” with the delivery address. Affiant knows based upon his training and experience that narcotics traffickers often use fictitious names and addresses, or incomplete recipient information, in order to conceal their true identities from law enforcement.

11. On or about October 13, 2022, Affiant obtained the assistance of Officer Reitz, a Canine Officer (“K9”) with the Houston Police Department (“HPD”) and certified handler of K9 “Bo”. Officer Reitz and “Bo” are certified as a team in the detection of controlled substances. Officer Reitz and “Bo” received their certification through the National Narcotic Detector Dog Association (NNDDA). “Bo” has numerous hours of training in the detection of controlled substances such as Marijuana, Cocaine, Methamphetamine, MDMA and Heroin. “Bo” has successfully alerted on concealed controlled substances in numerous prior cases, which has led to the arrest of numerous suspects for drug law violations. “Bo” was last certified in February 2022. Officer Reitz met Affiant at USPIs Houston Division Headquarters. At Officer Reitz’s direction, “Bo” was allowed to examine four (4) boxes which had been placed on the floor in an area known not to be contaminated with the odor of controlled substances. Three (3) of the boxes were “dummy” boxes (boxes containing no suspected controlled substances, in fact empty boxes) and the fourth one was the Subject Parcel. “Bo” conducted an exterior examination of all four (4) packages. Officer Reitz advised Affiant that “Bo” indicated a positive alert to the presence of a controlled substance scent coming from within the Subject Parcel.

12. Based on the facts set forth above, there is probable cause to believe that the Subject Parcel contains one or more controlled substances, drug paraphernalia, proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, and material relating to the distribution of same. In the past, all of the above factors have been indicative of packages which contained illegal controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances.

13. The Subject Parcel currently in the custody of your Affiant. Affiant, therefore, seeks the issuance of a search warrant for the search of the Subject Parcel for any such controlled substance, proceeds/funds for controlled substances or evidence, fruits of crime, and instrumentalities, in violation of Title 21, United States Code, Sections 841(a)(1), and 846.



Christopher J. Farmer
U. S. Postal Inspector

Subscribed and sworn to me by telephone at Houston, Texas, on this 13th day of October, 2022 and I find probable cause.



YVONNE Y. HO
UNITED STATES MAGISTRATE JUDGE